

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BEIJING CHOICE ELECTRONIC)	
TECHNOLOGY CO., LTD.,)	
)	
Plaintiff,)	
v.)	Civil Action No. 1:18-cv-00825
)	Honorable Sara L. Ellis
CONTEC MEDICAL SYSTEMS USA INC. and)	
CONTEC MEDICAL SYSTEMS CO., LTD.,)	
)	
Defendants.)	
)	

**JOINT MOTION FOR ENTRY OF
A SCHEDULING ORDER**

Plaintiff Beijing Choice Electronic Technology Co., Ltd. (“Beijing Choice”) and Defendants Contec Medical Systems USA Inc. and Contec Medical Systems Co., Ltd. (“Contec”) hereby jointly file this Motion for Entry of A Scheduling Order. In support of this motion, the parties states as follows:

1. On March 21, 2018, this Court entered the parties’ Stipulation Regarding Briefing And Discovery Deadlines For Plaintiff’s Motion For Preliminary Injunction (the “PI Scheduling Order.”) (Dkt. 41.)
2. Under the PI Scheduling Order, all fact discovery other than that related to the preliminary injunction was stayed. (Dkt. 41, ¶ 2.) In addition, the final contentions were stayed pending resolution of the preliminary injunction. (*Id.*, ¶ 9.)
3. On October 18, 2018, the parties filed their joint notice withdrawing the preliminary injunction (dkt. 113), which this Court entered on October 19, 2018. (Dkt. 114.)
4. As the case now resumes on the normal track, the parties wish to establish a schedule for the case through the claim construction hearing.

5. The parties propose the following schedule:

Date	Due
1/7/2018	Beijing Choice's Final Infringement Contentions due (LPR 3.1); Contec's Final Unenforceability and Invalidity Contentions due (LPR 3.1)
2/4/2019	Beijing Choice's Response to Final Unenforceability and Invalidity Contentions due (LPR 3.2); Contec's Final Non-infringement Contentions due (LPR 3.2)
02/15/2019	Exchange of proposed claim terms and constructions (LPR 4.1(a))
02/22/2019	Deadline to meet and confer to agree on terms for Court to construe (LPR 4.1(b))
03/15/2019	Close of fact discovery for claim construction phase (LPR 1.3)
03/22/2019	Contec's opening claim construction brief due (LPR 4.2(a)); Joint Appendix due (LPR 4.2(b))
04/19/2019	Beijing Choice's response to claim construction brief due (LPR 4.2(c))
05/03/2019	Contec's reply brief due (LPR 4.2(d))
05/10/2019	Joint claim construction chart and status report due (LPR 4.2(f))
05/31/2019	Claim construction hearing (LPR 4.3)

WHEREFORE, the parties respectfully request this Court to enter a scheduling order with the proposed dates as set forth above.

Dated: November 5, 2018

Respectfully submitted,

/s/ Stephen J. Rosenfeld

Stephen J. Rosenfeld
MCDONALD HOPKINS LLC
300 North LaSalle, Suite 1400
Chicago, IL 60654
Phone: (312) 280-0111
srosenfeld@mcdonaldhopkins.com

Kathleen A. Daley (*pro hac vice*)
FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, LLP
901 New York Avenue NW
Washington, DC 20001
Phone: (202) 408-4000
Fax: (202) 408-4400

kathleen.daley@finnegan.com

Michael Liu Su (*pro hac vice*)
FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, LLP
3300 Hillview Avenue, Second Floor
Palo Alto, CA 94304
Phone: (650) 849-6600
Fax: (650) 849-6666
michael.liu.su@finnegan.com

Mandy J. Song (*pro hac vice*)
Philip Z. Wang (*pro hac vice*)
Anita Bhushan (*pro hac vice*)
BAYES PLLC
1750 Tysons Boulevard, Suite 1500
McLean, VA 22102
Phone: (703) 995-9887
Fax: (703) 821-8128
mandy.song@bayes.law
philip.wang@bayes.law

*ATTORNEYS FOR PLAINTIFF
BEIJING CHOICE ELECTRONIC
TECHNOLOGY CO., LTD.*

/s/ Christopher C. Campbell

Christopher C. Campbell (*pro hac vice*)
ccampbell@cooley.com
Stephen C. Crenshaw (*pro hac vice*)
screnshaw@cooley.com
Naina Soni (*pro hac vice*)
nsoni@cooley.com
Nicholas Lockhart (*pro hac vice*)
nlockhart@cooley.com
COOLEY LLP
1299 Pennsylvania Avenue, NW, Suite 700
Washington, DC 20004-2400
Tel: (202) 842-7800
Fax: (202) 842-7899

Allen E. Hoover (IL 06216256)
ahoover@fitcheven.com
Joseph F. Marinelli
jmarinelli@fitcheven.com

Fitch, Even, Tabin & Flannery LLP
120 South LaSalle Street Suite 2100
Chicago, Illinois 60603
Tel: (312) 577-7000
Fax: (312) 577-7007

*Attorneys for Defendants Contec Medical
Systems USA Inc. and Contec Medical
Systems Co., Ltd.*

CERTIFICATE OF SERVICE

I, Stephen J. Rosenfeld, an attorney, hereby certify that on November 5, 2018, I electronically filed the foregoing document with the Clerk of the Court using the Electronic Case Filing System and in compliance with the General Order on Electronic Case Filing. As such, these documents were served on all counsel who are deemed to have consented to electronic service.

/s/Stephen J. Rosenfeld